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IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY a/s/o
ROCKWELL FREIGHT FORWARDING
LLC and UNIFOLD CORPORATION

Plaintiffs,

v.

JASMIN INTERNATIONAL CORP.

Defendant.

Civil Action No. 08 Civ. 0221 (JFK) ECF CASE

ANSWER AND COUNTERCLAIM

Defendant, Jasmin International Corp. ("Jasmin"), by its attorneys, for its answer and affirmative defenses to the complaint filed by plaintiffs, Federal Insurance Company a/s/o Rockwell Freight Forwarding LLC and Unifold Corporation, states as follows:

1. Jasmin is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1 of the complaint.

- 2. Jasmin is without knowledge or information sufficient to form a belief as to the truth of or denies the allegations in this paragraph 2 of the complaint except that it admits that it transported a shipment from Rockwell Freight Forwarding on or about April 13, 2007.
 - 3. Jasmin denies the allegations of paragraph 3 of the complaint.
 - 4. Jasmin denies the allegations of paragraph 4 of the complaint.
- 5. Jasmin is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5 of the complaint.
 - 6. Jasmin denies the allegations of paragraph 6 of the complaint.

First Defense

The complaint fails to state a claim upon which relief can be granted.

Second Defense

The goods were not delivered to Jasmin in good condition.

Third Defense

Jasmin was not given an opportunity to inspect the goods before they were loaded on its truck.

Fourth Defense

Plaintiff has not followed the claim procedures mandated by law and contract.

Counterclaim

Rockwell Freight Forwarding LLC ("Rockwell") has failed to pay to Jasmin the amounts due for conveyance of the cargo alleged in the complaint.

WHEREFORE, Jasmin demands judgment against Rockwell for such amount.

January 31, 2008

By: S/ Geoffrey Johnson

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